

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Carl Richard Drife

Case No.

Case: 2:22-mj-30143

Assigned To : Unassigned

Assign. Date : 3/18/2022

Description: RE: SEALED MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jul. 27, 2007-Sep. 2, 2008 & Jan. 11, 2022 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:*Code Section*18 USC § 2251(a)  
18 USC § 2252A(a)(5)(B)*Offense Description*Production of child pornography  
Possession of child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: March 17, 2022City and state: Detroit, Michigan  
Complainant's signatureRaymond C. Nichols, Special Agent (FBI)

Printed name and title



Judge's signature

Hon. David R. Grand, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A  
COMPLAINT AND ARREST WARRANT**

I, Raymond C. Nichols, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. I have been employed as a Special Agent of the FBI since February 2012 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI I obtained a bachelor's degree in computer information systems and was employed as a network/server administrator for approximately 9 years. While employed by the FBI, I have investigated federal criminal violations related to Internet fraud, computer intrusions, and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.

2. I have received training in the area of child pornography and child exploitation and have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 2252A. I am authorized by law to request an arrest warrant.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **CARL RICHARD DRIFE** (date of birth \*\*/\*\*/1962) for violations of 18 U.S.C. §§ 2251(a) (production of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

4. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents/officers, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **DRIFE** has violated 18 U.S.C. §§ 2251(a) and 2252A(a)(5)(B).

## **II. PROBABLE CAUSE**

5. On October 21, 2021, the Michigan State Police, Computer Crimes Unit, Internet Crimes Against Children Task Force (ICAC TF) received and reviewed a National Center for Missing and Exploited Children (NCMEC) CyberTip submitted by Yahoo! Inc. alleging an individual by the name of **CARL DRIFE** utilized multiple Yahoo! accounts to possess and distribute suspected child

pornography. In particular, **DRIFE** was suspected of using Yahoo! account “marycarlson\*\*\*\*@yahoo.com”.

6. A NCMEC review of the CyberTip submitted by Yahoo! indicated that it was related to additional CyberTips. A review of those CyberTips identified images and videos that appeared to meet the Federal definition of child pornography.

Three of those files are described below:

- a. Image 1 – this image appears to depict a nude pre-pubescent female child (approximately 4-6 years old). The child appears to be fully clothed and is depicted next to what appears to be an adult male wearing a t-shirt and underwear. The child is depicted with her hand on the adult male’s erect penis which is sticking out of his underwear.
- b. Image 2 – this image appears to depict a nude pubescent female child (approximately 11-14 years old) pictured from the waist down. The child is positioned on her side on top of a bare mattress. The child’s vagina and legs are centered in the image and appear to be the focal point of the image.
- c. Video 1 – this video is approximately 2 minutes 9 seconds in duration. The video appears to depict a pubescent female child (approximately 11-15 years old) undressing in what appears to be a bathroom. The child’s bare vagina is in clear focus at points of the video. The location of the camera appears to be in a different room focused toward the bathroom.

7. Through legal process the ICAC TF was able to identify the likely user of “marycarlson\*\*\*\*@yahoo.com” as **CARL RICHARD DRIFE** who resided at an address in the Eastern District of Michigan. On January 11, 2022, the ICAC TF

executed a search warrant at **DRIFE**'s residence. **DRIFE** was present at that time, was advised of his *Miranda* rights, and agreed to be interviewed.

8. During the interview, **DRIFE** stated he knew why the ICAC TF was at his residence. **DRIFE** admitted to viewing child pornography. **DRIFE** also acknowledged being the user of Yahoo! account "marycarlson\*\*\*\*@yahoo.com". **DRIFE** was presented with facial photos found within the account "marycarlson\*\*\*\*@yahoo.com", which depicted a young/teenage female. **DRIFE** identified the female as MV1 (born in 1995) who is now an adult.

9. **DRIFE** was shown a censored child pornography image that depicted a nude pubescent female (waist down) with her vagina exposed (described above in paragraph 6). **DRIFE** stated he took the photograph and identified the female displayed in the image as MV1.

10. **DRIFE** was shown a censored image (still image of a video) depicting a full-frontal nude of a pubescent female inside of a bathroom (described above in paragraph 6). **DRIFE** identified the pubescent female as MV1 and told investigators that the video was created inside of the address where the search warrant was executed. **DRIFE** had secretly set up and pointed a camera towards the bathroom to create the video.

11. **DRIFE** stated MV1 was between the ages of 10 to 16 years of age when the images and videos were created of her. **DRIFE** stated that he created the child pornography files depicting MV1 and that MV1 is unaware that those files exist.


12. A review of a search warrant return for Yahoo! account “marycarlson\*\*\*\*@yahoo.com” indicated that **DRIFE** had created photographs and videos of MV1 between July 27, 2007 and September 2, 2008. During that time period MV1 would have been between the ages of 11 and 13.

13. Devices belonging to **DRIFE** were previewed, processed, and examined. Subsequent to the examination of **DRIFE**’s cellphone, it was discovered the device contained multiple files of MV1 that appeared to meet the Federal definition of child pornography. Additionally, data on the device indicated that Yahoo! account “marycarlson\*\*\*\*@yahoo.com” had been accessed from that cellphone.

### III. CONCLUSION

14. Based on the foregoing, there is probable cause to believe **CARL RICHARD DRIFE** has violated 18 U.S.C. §§ 2251(a) (production of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,

  
Raymond C. Nichols, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
And/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", is written over a horizontal line.

HON. DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE

Date: March 17, 2022